

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

GS HOLISTIC, LLC,

Plaintiff.

v.

VAPE TOWN, INC. d/b/a VAPE TOWN
and JAWWAD MEHMOOD,

Defendants.

Case No. 1:23-cv-04969

Judge LaShonda A. Hunt

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT**

The Plaintiff, GS HOLISTIC, LLC, by and through its undersigned counsel, makes this request for entry of a default judgment pursuant to Rule 55(b) against the Defendant, JAWWAD MEHMOOD, and in support thereof states as follows:

1. The Plaintiff filed its Complaint against the Defendant on July 29, 2023 [DE 1].
2. On August 11, 2023, the Defendant, JAWWAD MEHMOOD, was served with the Complaint and Summons [DE 9].
3. A Clerk's default was entered against the Defendant, JAWWAD MEHMOOD, on December 12, 2023. *See* [DE 30].
4. A Default Final Judgment was already entered against the Defendant, VAPE TOWN, INC. d/b/a VAPE TOWN, on December 12, 2023, [DE 31], therefore, the Plaintiff now moves for entry of default judgment pursuant to Fed. R. Civ. P. 55(b) against the Defendant, JAWWAD MEHMOOD.

5. In support of the motion, the Plaintiff submits the following certifications:

Exhibit A: Affidavit of Attorney Ryan S. Fojo, as to docket review and costs expended.

Exhibit B: Affidavit of Christopher Folkerts, Chief Executive Officer of GS Holistic, LLC, as to statutory damages.

Exhibit C: Judgment in GS Holistic, LLC. v. Envirocure, LLC. and Hassan Abid (22-cv-60463-BLOOM/Valle) for \$151,147.89 in statutory damages.

Exhibit D: Judgment in GS Holistic, LLC. v. One Stop Vape et al (2:22-cv-04628-SVW-AGR) for \$225,000 in statutory damages and \$1,482 in costs.

Exhibit E: Judgment in GS Holistic, LLC. v. Cali Smoke Depot LLC et al (2:22-cv-06679-SPG-KS) for \$150,000 in statutory damages and \$1,0999.86 in costs.

Exhibit F: Judgment in GS Holistic, LLC. v. Bellair Cigarettes Inc et al One Stop Vape et al (2:22-cv-06363-GW-MRW) for \$150,000 in statutory damages and \$955.69 in costs.

Exhibit G: Judgment in GS Holistic, LLC. v. Pyramids Wholesale et al (2:22-cv-04632-SPG-RAO) for \$300,000 in statutory damages and \$1,462 in costs.

Exhibit H: Judgment in GS Holistic, LLC. v. Smoke Unlimited et al (1:22-cv-21254-FAM) for \$250,000 in statutory damages and \$563.41 in costs.

Exhibit I: Judgment in GS Holistic, LLC. v. Abood Enterprise et al (1:22-

cv-06161) for \$150,000 in statutory damages and \$817 in costs.

Exhibit J: Pictures of infringing sale

Exhibit K: USPTO registration certificates for Stündenglass Marks.

6. Plaintiff also submits and relies upon the Memorandum of Law in Support of Statutory Damages, in the amount of \$150,000.00.

WHEREFORE, the Plaintiff requests default judgment against JAWWAD MEHMOOD, in the amount of \$150,000.00.

/s/ Ryan S. Fojo
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Attorney for the Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 11, 2024, the foregoing document, the Plaintiff's Motion for Default Judgment, and its Exhibits, were mailed, via certified mail, from 270 SW Natura Avenue, Deerfield Beach, Florida 33441, proper postage pre-paid addressed to:

Jawwad Mehmood
7201 Foster St.
Morton Grove, IL, 60053-1104
1069 Longboat Ct, Schaumburg,
IL 60194-1316

/s/ Ryan S. Fojo
Ryan S. Fojo